

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL CASE NO. 2:19-cv-767-ECM
)	
DYNAMIC SECURITY, INC.)	
)	
Defendants.)	

DEFENDANT DYNAMIC SECURITY, INC.'S PROPOSED
VOIR DIRE QUESTIONS

Defendant Dynamic Security, Inc. (“Dynamic” or “Defendant”), by and through its undersigned counsel, pursuant to Court’s February 21, 2023 Order (doc. 147), submits the following proposed *voir dire* questions to be asked by the Court of prospective jurors in addition to the Court’s standard *voir dire* questions or that the Court allow Dynamic’s Counsel to ask these questions.

1. Have you ever filed any form of claim or complaint against any current or prior employers?
2. If you are instructed by the judge to disregard something you heard at trial, is there any reason that you would not be able to do so?
3. Have you worked for a staffing company or one that provides employees to another company?

4. Does anyone here have a family member who is an attorney or who works for a law firm?

5. Is anyone here employed in or related to anyone who is employed in human resources?

6. In this action, Plaintiff claims that Dynamic Security violated her rights by terminating her for complaining about a grooming policy she thought was applied differently to her because of her race. Defendant denies that Plaintiff complained about race, that it terminated her, and that it retaliated against her and claims it offered her other positions. With this in mind, is there anyone here who has a strong opinion one way or the other about such lawsuits?

7. Have you ever been a manager or a supervisor in the workplace?

8. Could you be impartial in a dispute between a company and an individual?

9. Is there any reason you could not be impartial in a dispute between an employer and a former employee?

10. Have you or any of your family members, friends, or acquaintances ever felt retaliated against at work?

11. Have you or any of your family members, friends, or acquaintances ever felt you were treated unfairly by your employer, your supervisors, or your co-workers for any reason?

12. Do you have any close relatives or friends who have worked or currently work for HMMA? If so:

- 1) What is the relationship between that person and yourself?
- 2) In what capacity did that person work for HMMA and for how long?
- 3) For what reason did that person stop working for HMMA?

13. Have you ever had any problems with any of the services provided by HMMA?

14. If you have had any problems with any of the services provided by HMMA, do you have any ill feelings towards the company?

15. Another company involved in this case is Hyundai Engineering America, Inc. (“HEA”). HEA provides contract services to HMMA at the Hyundai plant south of Montgomery. Have you ever worked for HEA or do you currently work for HEA? If so:

- 1) In what capacity did you work for HEA and for how long?
- 2) For what reason did you stop working for HEA?

16. Do you have any close relatives or friends who have worked or currently work for HEA? If so:

- 1) What is the relationship between that person and yourself?
- 2) In what capacity did that person work for HEA and for how long?
- 3) For what reason did that person stop working for HEA?

17. Have you ever had any problems with any of the services provided by HEA?

18. If you have had any problems with any of the services provided by HEA, do you have any ill feelings towards the company?

19. Have you ever worked for, or do you currently work for, any employer providing materials or services for the Hyundai plant or Hyundai operations?

1) In what capacity did you work for that employer and for how long?

2) For what reason did you stop working for that employer?

3) When you performed that job, were you physically located at the Hyundai plant?

20. Do you have any close relatives or friends who have worked or currently work for that employer? If so:

- 1) What is the relationship between that person and yourself?
 - 2) In what capacity did that person work for that employer and for how long?
 - 3) For what reason did that person stop working for that employer?
21. Have you ever had any problems with any of the operations of the Hyundai plant?
22. If you have had any problems with any of the operations of the Hyundai plant, do you have any ill feelings about that?
23. Does anyone have a problem accepting that the purpose of this trial is to determine whether or not Ms. Key's claims in this lawsuit have any merit and that she is not automatically entitled to recover anything just because she filed this lawsuit?
24. Has anyone here ever been a party to any civil action in which discrimination, harassment or retaliation was alleged to have been committed?
25. Have you heard of, or been associated with, a similar case to the one described?
26. Have you or anyone close to you ever participated in an employment lawsuit?
27. Anyone ever disciplined for violating a grooming policy?
28. Anyone ever been treated unfairly under a grooming policy relating to

hair?

29. Have you, or any of your close friends, family, or people you associate with, ever been falsely accused of discrimination or retaliation stemming from employment?

30. Has anyone ever felt like they were discriminated/retaliated against in the workplace and decided not to file a complaint?

31. Do you have any strong feelings for or against laws that protect employees from discrimination or retaliation based on a protected class such as race?

32. Have you or any close family members been a member of a union?

1) If so, were you ever a union delegate? Shop steward? Hearing officer? Arbitrator?

33. Do you believe that the fact that Plaintiff is accusing a corporation of violating the law, in itself, suggests that Plaintiff was treated unlawfully?

34. Have you ever been terminated from a job?

35. Have you, or anyone in your family or people you closely associate with, filed a lawsuit against their employer?

36. Have you, or anyone in your family or people you closely associate with, owned a company or been part of ownership?

37. Did you ever have hiring and firing authority in a job you had?

38. Have you, or a close friend, family member, or any person you associate

with, ever been accused of engaging in discriminatory or retaliatory conduct in the workplace?

39. Have you had or experienced any positive or negative experiences in the workplace involving a termination and/or discipline which might interfere with your ability to serve as an impartial and unbiased juror?

40. Does anyone believe that just because a person or entity gets sued, the person or entity being sued must have done something wrong?

41. Would you have a tendency to award Plaintiff money damages because you believe Dynamic can afford to pay her?

Respectfully submitted,

/s/ Wesley C. Redmond
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on 28th day of February, 2023, he electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to:

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